

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIO CARRION CARRASQUILLO
DAMARIS GONZALEZ FLORES

DEBTORS

CASE NO 15-07433 MCF

CHAPTER 13

DEBTORS' REPLY TO TRUSTEE'S MOTION FOR INCOME TAX RETURNS
DOCKET NO. 48

TO THE HONORABLE COURT:

COME NOW, MARIO CARRION CARRASQUILLO and DAMARIS GONZALEZ FLORES, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion for Income Tax Returns*, Docket No. 48, basically requesting an Order from the Court directing the Debtors to "... submit complete and legible copy (ies) of the return(s) aforementioned...". *Trustee's Motion for Income Tax Returns*, Docket No 48.

2. The Debtors hereby reply to the Trustee's motion stating that on this same date the Debtors sent to the Chapter 13 Trustee (uploaded to the trustee's system) a copy of their 2015, 2016, 2017 and 2018 tax returns.

3. The Debtors hereby respectfully submit their reply to the Trustee's motion for income tax returns, Docket No. 48.

WHEREFORE, the Debtors respectfully pray that this Honorable Court grant the present motion and deny the Trustee's motion for entry of order for tax returns since the Debtors duly submitted the same to the Chapter 13 Trustee, in the above captioned case.

Page -2-

Reply to Trustee's Motion for Order
Case no. 15-07433 MCF13

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee and to all CM/ECF participants and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: the Debtors, Mario Carrion Carrasquillo and Damaris Gonzalez Flores, Urb Santa Juana 2 E 3 Calle 3 Caguas RP 00725, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 15th day of May, 2019.

/s/Roberto Figueroa Carrasquillo

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

Attorney for the Debtors

PO BOX 186 CAGUAS PR 00726-0816

TEL 787-744-7699 FAX 787-746-5294

EMAIL: rfigueroa@rfclawpr.com